

STEPHEN W. STEELMAN (CSBN 196147)
LAW OFFICE OF STEPHEN W. STEELMAN
22 Battery Street, Suite 333
San Francisco, CA 94111
Tel. (415) 593-3777
Fax (415) 593-3778

Attorney for Plaintiff
ALEXANDER P. SOMMER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

-oo0oo-

ALEXANDER P. SOMMER, an individual

CASE NO. C-07-2864 SC

Plaintiff,

v.

DECLARATION OF STEPHEN
STEELMAN IN OPPOSITION TO
DEFENDANTS MOTION TO
DISMISS

UNUM, UNUM PROVIDENT CORPORATION;
UNUM PROVIDENT LIFE INSURANCE
COMPANY OF AMERICA; FIRST UNUM
LIFE INSURANCE COMPANY OF AMERICA;
PAUL REVERE LIFE
INSURANCE COMPANY;
UNITED STATES LIFE INSURANCE
COMPANY,

AND DOES 1-300,

Defendants.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I, Stephen W. Steelman, am attorney of record to plaintiff Alexander P. Sommer herein. I am, accordingly, thoroughly familiar with the facts and circumstances underlying this matter and could, and would if called to do so testify competently to the following:

1. Attached hereto, as **EXHIBIT "A"** is an Original document printed out by me from the official website of defendant herein UNUM Group;
2. Attached hereto, as **EXHIBIT "B"** is an Original document printed out by me from the official website of Goliath, a for-fee web-based business information provider;
3. Attached hereto, as **EXHIBIT "C"** is an Original document printed out by me from the official website the Department of Commerce of the State of Tennessee, home to UNUM Group;
4. Attached hereto, as **EXHIBIT "D"** is an Original document printed out by me from the official website the Department of Commerce of the State of Tennessee, home to defendant herein UNUM Group;
5. Attached hereto, as **EXHIBIT "E"** is an Original document printed out by me from the official website of the *New York Times*;
6. Attached hereto, as **EXHIBIT "F"** is an Original document printed out by me from the official website of the California Department of Insurance;
7. Attached hereto, as **EXHIBIT "G"** is an Original document printed out by me from the official website of the *Silicone Valley Business Journal*;
8. Attached hereto, as **EXHIBIT "H"** is an Original document printed out by me from the official website of a web based periodical entitled *Insurance Journal*;
 - a. Pages one through three of such document proprot to describe a certain letter from a member of the State Bar of California and the San Francisco Bar Association, one Ray Bourhis to the Insurance Commissioner of the State of California;
 - b. Pages four through six proprot to be an actual and original print out of correspondence itself.

1 Dated: October 9, 2006

2

3

/S/

STEPHEN STEELMAN

4

Counsel to Plaintiff

5

Alexander P. Sommer

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28